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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 SHIGE TAKIGUCHI, FUMI NONAKA,
16 MITSUAKI TAKITA, TATSURO SAKAI,
17 SHIZUKO ISHIMORI, YUKO NAKAMURA,
18 MASAAKI MORIYA, HATSUNE HATANO, and
19 HIDENAO TAKAMA, individually and on behalf of
20 all others similarly situated,

21 Plaintiff,

22 v.

23 MRI INTERNATIONAL, INC., EDWIN J.
24 FUJINAGA, JUNZO SUZUKI, PAUL MUSASHI
25 SUZUKI, LVT, INC., dba STERLING ESCROW,
26 and DOES 1-500,

27 Defendants.

28 Case No.: 2:13-cv-01183-HDM-NJK
Hon. Howard D. McKibben

**STIPULATION AND ORDER
AUTHORIZING THE SALE OF 145
E. HARMON AVE., UNITS 2702 &
2704**

1 Plaintiffs Shige Takiguchi, et al. and Defendants (1) Junzo Suzuki, (2) Paul Suzuki, (3) Keiko
2 Suzuki, (4) Suzuki Enterprises, Inc. Profit Sharing Plan (“the SEI PSP”), (5) Catherine (Ishii) Suzuki,
3 trustee of the Junzo Suzuki Irrevocable Trust, (6) Catherine Suzuki, trustee of the Keiko Suzuki
4 Irrevocable Trust, (7) Catherine Suzuki, trustee of the Junzo Suzuki and Keiko Suzuki Irrevocable Trust,
5 (9) Suzuki Enterprises, Inc., (8) Puuikena Investments LLP, (9) Catherine Suzuki, individually and as
6 trustee of the Catherine Suzuki Irrevocable Trust dated May 10, 2013, (10) Paul Musashi Suzuki, trustee
7 of the Paul Musashi Suzuki Irrevocable Trust dated May 10, 2013 (collectively “the Suzuki
8 Defendants”), submit this stipulation and order authorizing sale of real properties located at 145 E.
9 Harmon Avenue, Units 2702 and 2704, Las Vegas, Nevada 89109.

10 WHEREAS, on January 3, 2018, this Court preliminarily approved the settlement with the Suzuki
11 Defendants by orders dated January 3, 2018 (Dkt. 789) and January 11, 2018 (Dkt.797);

12 WHEREAS, on January 3, 2018, the Court also granted the parties’ stipulation to appoint certain
13 brokers for the sale of real properties (Dkt. 790);

14 WHEREAS, pursuant to the Settlement Agreement and the orders of the Court, the Suzuki
15 Defendants retained Heidi Williams of Realty ONE Group on January 22, 2018 and she listed the
16 properties located at 145 E. Harmon Avenue, Units 2702 and 2704, Las Vegas, Nevada 89109
17 (“Properties”) for sale;

18 WHEREAS, upon reviewing the comparable sales in the area and consulting with Ms. Williams,
19 the parties agreed to list the Properties for \$599,888;

20 WHEREAS, on February 15, 2018 the Suzuki Defendants received an offer to purchase the
21 Properties for \$578,888;

22 WHEREAS, on February 16, 2018, upon discussions with Ms. Williams, the parties agreed to
23 present a counter-offer of \$585,000, contingent upon Court approval;

24 WHEREAS, on February 20, 2018, the potential buyer accepted the counter-offer to purchase the
25 Properties for \$585,000;

26 WHEREAS the parties and Ms. Williams believe that it is a strong offer and is in the best interest
27 of the Parties;

28 WHEREAS, a copy of the executed Purchase and Sale Agreement is attached hereto as Exhibit A;

1 and

2 WHEREAS, a declaration from Ms. Williams is attached hereto as Exhibit B;

3 Based on the forgoing, the parties stipulate as follows:

4 1. That the Court authorize the sale of 145 E. Harmon Avenue, Units 2702 and 2704, Las
5 Vegas, Nevada 89109 for \$585,000 and pursuant to the terms of the Purchase and Sale
6 Agreement attached hereto as Exhibit A.

7 Dated: February 20, 2018

8 MANNING & KASS
9 ELLROD, RAMIREZ, TRESTER LLP

10 By: /s/ James Gibbons
11 JAMES E. GIBBONS
12 STEVEN J. RENICK
13 Attorneys for Plaintiffs

14 LAW OFFICES OF ROBERT W. COHEN
15 A Professional Corporation

16 By: /s/ Robert W. Cohen
17 ROBERT W. COHEN
18 MARIKO TAENAKA
19 Attorneys for Plaintiffs

20 PAUL HASTINGS LLP

21 By: /s/ Nicolas Morgan
22 NICOLAS MORGAN
23 Attorneys for Defendant Junzo and Paul
24 Suzuki

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 DATED: February 26, 2018

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United States District Judge